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STATE CAPITOL CHEYENNE, WY 82002

# Office of the Governor

October 19, 2006

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## RE: Casper Draft Resource Management Plan and Environmental Impact Statement

Dear Mr. Murkin and Ms. Slone:

Thank you for the opportunity to comment on the draft Casper Resource Management Plan (RMP) and for the collaboration opportunities you have provided cooperating agencies and the public over this resource management revision process. Through your revision process you have demonstrated that, by collaborating early, many concerns can be addressed upfront, worked through and alleviated.

I commend you on a well-drafted RMP and thank you for your efforts over the last four years. More specifically, thank you for your work with my office and the state agencies on drafting the goals and objectives. Through our collaborative effort, we now have goals and objectives that will provide meaningful and specific direction over the life of this RMP. While I remain supportive of the document overall, I do provide the following suggestions:

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#### Surface Disturbance

The definition of "surface disturbing activity" in the glossary is followed by a parenthetical phrase that says the state BLM office is revising this definition. Yet, the term "surface disturbing activity" is used often throughout the draft RMP. The exact definition for this term is needed to evaluate the draft RMP and its effects upon resources and resource uses. The public cannot knowledgably evaluate and comment on the draft RMP if this definition is unknown or if it is changed by the state BLM office. This definition needs to be revised and the public allowed to comment on it and the subsequent impacts in each of the alternatives .

### Parcel Disposal Recommendations

Although there may be a need to sell or exchange tracks of BLM property to enhance management effectiveness, improve public access or increase federal land consolidation, I ask that you consult with the state of Wyoming, especially the Game and Fish Department, on these proposed actions. Many of the parcels earmarked for disposal provide 1) important habitat, including crucial winter range for big game and habitat for sagebrush-obligate species (e.g., sage grouse) and 2) important recreational opportunities such as hiking, hunting and fishing.

## **Management of National Historic Trails**

As part of an effort to achieve consistency statewide in the management of National Historic Trails, the State Historic Preservation Office (SHPO) has expressed concern with the proposed management for the National Historic Trails (NHTs) in the preferred alternative. The preferred alternative proposes "controll ed surface use within ¼ mile or the visual horizon, whichever is closer to ensure that surface disturbing activities avoid trail remains and the lands immediately surrounding them," whereas the 1985 RMP provided for "no surface occupancy within ¼ of the visual horizon, whichever is closer." It is my understanding the no surface occupancy stipulation in the 1985 RMP is more restrictive on the types of allowable activities than the proposed CSU stipulation.

SHPO is requesting the language in the preferred alternative be modified for NSO within ¼ mile of the outermost trace of the National Historic Trails and other trails unless to the benefit of the preservation or interpretation of the trail. Inclusion of an NSO for the ¼ mile buffer in the Casper field office would ensure consistency with the Pinedale RMP.

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### **Snowmobiling**

There is some confusion as to how snowmobiling will be covered in the RMP. It appears that snowmobiling is addressed under the overall definition of Off Road Vehicles (ORVs), but that is not clear. The final RMP should clarify how snowmobiles will be specifically managed.

### **North Platte River Protection**

The North Platte River is a world-class fishery and deserves appropriate protection. The draft RMP is inconsistent as to how the BLM plans to prevent degradation of this tremendous resource. One portion of the document indicates that the North Platte River will be classified as a Special Management Area (SMA); another portion classifies the river as a Special Recreation Management Area. The ultimate designation should be managed to allow for existing uses while at the same time providing, to the greatest extent possible, protection of the qualities that make it such a unique and viable fishery.

### Wind River SMA

I appreciate the creative management initiative of setting aside the Wind River SMA as an energy concentration focus area. I agree that exceptions to the winter wildlife stipulations are likely and ask that, as those proposals come forward, you strongly encourage mitigation to compensate for significant wildlife and surface disturbance related to energy development in this area.

Thank you again for the opportunity to comment and for your continued partnership in the management of Wyoming's resources. I look forward to working with you in the future, both on the finalization of this document and on the on-the-ground implementation of the items we have incorporated into this document over the last several years.

Best regards,

Dave Freudenthal

Governor

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